

**Federal Defenders  
OF NEW YORK, INC.**

Eastern District  
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July 24, 2024

The Honorable Hector Gonzalez  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: ***United States v. Grinin et al., 22-CR-409 (HG)***

Dear Judge Gonzalez:

Mr. Vadim Yermolenko, Mr. Brayman, and Mr. Konoshchenok are currently charged before the Court by indictment in *United States v. Grinin, et al.*, 22-CR-409. The Court previously issued a briefing schedule, with the defense's pretrial motions due August 1, 2024. Co-defense counsel jointly requests that the defense briefing schedule be extended to August 16, 2024. These defendants require additional time to assess discovery, evaluate evolving legal authority and prepare their motions. Based on this request, the defendants request the new schedule be set as follows:

Aug. 16 – defense motions

Sept. 13 – government responses

Sept. 24 – defense replies (if any)

Defendants have informed the Government of this request and the new schedule and the Government has no objection. Thank you for your consideration.

Respectfully Submitted,

/s/ Nora K. Hirozawa

Nora K. Hirozawa

James Darrow

Counsel to Vadim Yermolenko

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/s/ Michael K. Fee

Michael K. Fee

David G. Lazarus

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/s/ Sabrina Shroff

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Counsel to Vadim Konoshchenok

cc: AUSA Artie McConnell  
AUSA Craig Heeren  
AUSA Matthew Skurnik  
AUSA Andrew Reich